

PROSKAUER ROSE LLP  
Elise M. Bloom  
Amy F. Melican (EG-7402)  
Eleven Times Square  
New York, NY 10036-8299  
Telephone 212.969.3000  
Fax 212.969.2900  
Email: ebloom@proskauer.com  
amelican@proskauer.com  
*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ERIC GLATT, ALEXANDER FOOTMAN,	:
EDEN ANTALIK, and KANENE GRATTS, on	:
behalf of themselves and all others similarly	:
situated,	:
	:
Plaintiffs,	:
	:
v.	:
	:
FOX SEARCHLIGHT PICTURES, INC., and	:
FOX ENTERTAINMENT GROUP, INC.,	:
	:
Defendants.	:
-----	X

**No. 11 Civ. 6784 (WHP) (AJP)**

**ECF CASE**

**DECLARATION OF**  
**ELISE M. BLOOM, ESQ.**

I, Elise M. Bloom, Esq., declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of the law firm of Proskauer Rose LLP, attorneys for Defendants Fox Searchlight Pictures, Inc., and Fox Entertainment Group, Inc., in the above-captioned action. I am fully familiar with the facts set forth herein. I submit this declaration in support of Defendants' motion for summary judgment.

2. In or around Fall 2011, in connection with discussions with Plaintiffs about the scope of discovery and the selection of the “sample films” for which discovery would be conducted, Searchlight identified 27 different film productions that *potentially* had engaged unpaid interns during the time period and circumstances relevant to this action and I provided that information to Plaintiffs.

3. Attached hereto as Exhibit A is a true and correct copy of the Amended Complaint in the above-captioned action, *Glatt v. Fox Searchlight Pictures, Inc.*, No. 11 Civ. 6784 (WHP) (AJP).

4. Attached hereto as Exhibit B is a true and correct copy of the docket sheet from *Glatt v. Fox Searchlight Pictures, Inc.* No. 11 Civ. 6784 (WHP), which was printed from the Court’s system on February 15, 2013.

5. Attached hereto as Exhibit C are true and correct copies of the relevant transcript pages an exhibit from the deposition of Plaintiff Alexander Footman, taken by Defendants on May 7, 2012.

6. Attached hereto as Exhibit D are true and correct copies of the relevant transcript pages and exhibits from the deposition of Eric Glatt, taken by Defendants on May 11, 2012.

7. Attached hereto as Exhibit E is a true and correct copy of the relevant transcript pages from the deposition of Eden Antalik, taken by Defendants on July 23, 2012.

8. Attached hereto as Exhibit F is a true and correct copy of the relevant transcript pages from the deposition of Kanene Gratts, taken by Defendants on December 4, 2012.

9. Attached hereto as Exhibit G is a true and correct copy of the relevant transcript pages from the deposition of Elizabeth Sayre, taken by Plaintiffs on August 15, 2012.

10. Attached hereto as Exhibit H is a true and correct copy of the relevant transcript pages from the deposition of Aimee Hoffman, taken by Plaintiffs on August 16, 2012 and December 14, 2012.

11. Attached hereto as Exhibit I is are true and correct copies of the relevant transcript pages and exhibits from the deposition of John Maybee, taken by Plaintiffs on August 9, 2012.

12. Attached hereto as Exhibit J is a true and correct copy of the transcript pages from the deposition of Scott Franklin, taken by Plaintiffs on November 19, 2012.

13. Attached hereto as Exhibit K are true and correct copies of the relevant transcript pages and exhibits from the deposition of Theodore Hope, taken by Plaintiffs on August 7, 2012.

14. Attached hereto as Exhibit L are true and correct copies of the relevant transcript pages and exhibits from the deposition of Lori Keith Douglas, taken by Plaintiffs on November 19, 2012.

15. Attached hereto as Exhibit M are true and correct copies of the relevant transcript pages and exhibits from the deposition of David Johnson, taken by Plaintiffs on December 13, 2012.

16. Attached hereto as Exhibit N is a true and correct copy of a certified copy of the New York State Department of State Certificate of Incorporation for Lake of Tears, Inc., filed on September 11, 2009.

17. Attached hereto as Exhibit O is a true and correct copy of the declaration of Theodore Au, dated July 25, 2012, without exhibits.

18. Attached hereto as Exhibit P is a true and correct copy of the declaration of Joan Hansen, dated January 10, 2013, which was produced by Plaintiffs (P012198-99).

19. Attached hereto as Exhibit Q is a true and correct copy of certain employment paperwork for Theodore Au in connection with the *Black Swan* production (D0094202-04 and D0094194-97) (with personally identifying information redacted).

20. Attached hereto as Exhibit R is a true and correct copy of certain employment paperwork for Lindsay Feldman in connection with the *Black Swan* production (D0094190-3) (with personally identifying information redacted).

21. Attached hereto as Exhibit S is a true and correct copy of certain employment paperwork for David Farr in connection with the *Black Swan* production (D0094190-3)(with personally identifying information redacted)..

22. Attached hereto as Exhibit T is a true and correct copy of Production/Finance/Distribution Term Sheet Agreement (“PFD Agreement”) between Lake of Tears, Inc. and Fox Searchlight Pictures, Inc. with respect to *Black Swan* film, which is Exhibit 1 marked at the deposition of Scott Franklin (DS0004731-883).

23. Attached hereto as Exhibit U is a true and correct copy of a September 14, 2009 email to Plaintiff Eric Glatt from Alexandra Mendes (P003196).

24. Attached hereto as Exhibit V is a true and correct copy of *Black Swan* Final Crew List, dated February 26, 2010 (DS0001795-1801) (with personally identifying information redacted).

25. Attached hereto as Exhibit W is a true and correct copy of a November 24, 2009 email exchange to Eric Glatt (P0003244-45).

26. Attached hereto as Exhibit X is a true and correct copy of the “Final Crew List” for *Our Family Wedding* (DS0001555-1566) (with personally identifying information redacted)..

27. Attached hereto as Exhibit Y is a true and correct copy of the Call Sheet for the first and last day of filming on *Our Family Wedding* (D0001483-4).

28. Attached hereto as Exhibit Z is a true and correct copy of the “End Title Credits” with respect to *Our Family Wedding* (D0000434-43).

29. Attached hereto as Exhibit AA is a true and correct copy of excerpts from Alexander Footman’s Responses and Objections to Defendant’s First Set of Interrogatories, dated May 18, 2012.

30. Attached hereto as Exhibit BB is a true and correct copy of the “Crew Deal Memo” with respect to *Cedar Rapids* (D0002428-2430).

31. Attached hereto as Exhibit CC is a true and correct copy of “Final Crew List” with respect to *The Savages* (DS0000820-843) (with personally identifying information redacted).

32. Attached hereto as Exhibit DD is a true and correct copy of *500 Days of Summer* Call Sheets (D0001857-60; 1831-36).

33. Attached hereto as Exhibit EE is a true and correct copy of excerpts from Eric Glatt's Responses and Objections to Defendant's First Set of Interrogatories, dated May 18, 2012.

34. Attached hereto as Exhibit FF is a true and correct copy of the Final Crew List with respect to *500 Days of Summer* (DS0001914-31) (with personally identifying information redacted).

35. Attached hereto as Exhibit GG is a true and correct of Call Sheets with respect to *Cedar Rapids* (D0001698-99; 1772-73).

36. Attached hereto as Exhibit HH is a true and correct copy of a December 2, 2008 e-mail from Eden Antalik (D0068609).

37. Attached hereto as Exhibit II is a true and correct copy of a July 21, 2009 e-mail exchange between John Maybee to Aimee Hoffman (D0049699-70).

38. Attached hereto as Exhibit JJ is a true and correct copy of a July 21, 2009 e-mail exchange between John Maybee and Aimee Hoffman (D0051780-83).

39. Attached hereto as Exhibit KK are relevant excerpts from NewsCorp's 2010 Form 10K filing, which is publicly available and which was Exhibit 2 in the deposition of Veronica Arroyo.

40. Attached hereto as Exhibit LL is a true and correct copy of the declaration of Brian Bell.

I affirm under penalty of perjury that the foregoing is true and correct.

Dated: February 15, 2013  
New York, New York

By: /s/ Elise M. Bloom  
Elise M. Bloom  
PROSKAUER ROSE LLP  
Eleven Times Square  
New York, NY 10036-8299  
Telephone: 212.969.3000  
Fax: 212.969.2900  
E-mail: ebloom@proskauer.com  
*Attorneys for Defendants*